

BCC 97-538
October 22, 1997PHONE: (406) 721-5700
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AND WILDLIFE SERVICE
GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE

OCT 27 1997

Dear Dr. Servheen:

We appreciate the opportunity to comment on the Bitterroot Grizzly Bear Recovery proposal, and thank you for the time you spent with us discussing the four alternatives. We commend you for the scientific research behind the project and your work in obtaining public input.

Based on the habitat needs of the bears, testimony by Missoula County residents, and the need for economic sustainability in the region, we support implementation of Alternative 4, with two modifications:

1. A Citizen's Management Committee, as described in Alternative 1, should be appointed to develop management plans and policies for management of grizzly bears within the recovery zone and habitat linkage corridor. These plans and policies would need to conform with all of the protections required with threatened status under the Endangered Species Act (ESA).
2. Road building and timber harvest on presently roadless lands should not be categorically prohibited. ESA Section 7 consultation with the Citizen's Management Committee and the US Fish and Wildlife Service will provide adequate protection for the grizzly and ensure that important timber jobs are retained. In addition, we do not agree with the automatic closure of the Magruder Road as proposed in this alternative.

We do not support the "nonessential experimental" proposal because such a designation can only be used when the loss of the population does not appreciably reduce the likelihood of the species' survival. However, the draft EIS itself justifies reintroduction by documenting the importance of a Bitterroot population to the long-term survival of the species in the Northern Rockies. This rationale makes the nonessential designation inappropriate. In addition, such a designation would provide more reasons to kill individual bears that had previously enjoyed full protection but were "delisted" into "nonessential experimental" status with relocation.

The conservation biology approach of Alternative 4, with the changes suggested above, will provide the best long-term strategy for recovering the bear, protecting habitat and providing a sustainable economy. The resource protection and restoration will improve

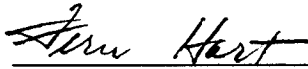
overall forest and stream health and ensure that all species have adequate habitat. This habitat conservation is a proactive approach to preventing the future need for costly and socially divisive reintroductions of sensitive species such as the lynx and bull trout. As the science in the Interior Columbia River Basin Project has shown, we cannot manage individual species of animals or vegetation without considering the broader implications of biodiversity.

We also believe that the Citizen's Management Committee is crucial to the success of Alternative 4, as it will ensure that local values are respected and allow for direct accountability for management actions. We would welcome the opportunity to participate in the selection of that committee's membership.

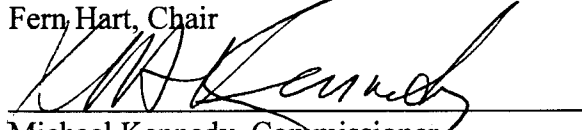
Finally, while concerns over conflicts between grizzly bears and humans are very real and legitimate, our experience in Missoula County proves that large predators and humans can peacefully coexist. As you know, the Seeley Lake, Swan Valley, and Evaro areas are all within or adjacent to occupied grizzly bear habitat. In addition, wolves have recently reestablished residence in the Ninemile Valley. The protections afforded by the threatened status of these two species have not adversely affected the livelihoods, lifestyles, or safety of residents in any of these four communities.

As indicated by public testimony at the October 2nd hearing in Missoula, citizens believe that grizzly bears belong in the Bitterroot Ecosystem and should have the full protection of the Endangered Species Act. We wholeheartedly support these sentiments and offer reasonable measures to ensure that local input is maintained and that the region's economy is not adversely affected.

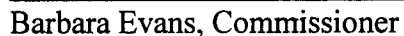
Sincerely,
BOARD OF COUNTY COMMISSIONERS



Fern Hart, Chair



Michael Kennedy, Commissioner



Barbara Evans, Commissioner

cc: Missoulia
Brian Maiorano, OPG